

Bruce I. Afran  
Attorney-at-Law  
10 Braeburn Dr.  
Princeton, N.J. 08540  
606-454-7435

March 14, 2024

The Honorable Katherine Polk Failla  
United States District Judge  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *Consortium for Independent Journalism, Inc. v. United States of America & NewsGuard Technologies, Inc.*, Case No. 23-cv-07088-KPF

Dear Judge Failla:

As counsel for plaintiff, I am reporting that plaintiff will take advantage of the opportunity to file a Second Amended Complaint (SCA), as discussed in the conference last week. Your Honor indicated that a three-week period to file the amendment could be available. I would like to take advantage of that time frame as I have been undergoing medical treatment the past month and the additional time would be helpful. We will try to file the SCA earlier, if possible.

Accordingly, plaintiff proposes that the SCA be filed on or by Friday, April 5, 2024, if that would be agreeable to the Court. I assume this schedule will not be inconvenient to the defendants.

Thank you for your consideration.

Respectfully submitted,

S/Bruce I. Afran  
Counsel for Plaintiff

**Via ECF**